

CULPEPPER IP, LLC
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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

In re Subpoena to)	
)	Case No.: 1:21-mc-322
)	
Leaseweb USA, Inc.)	

DECLARATION PURSUANT TO 17 U.S.C. 512(h)

KERRY S. CULPEPPER, hereby declares under penalty of law that the following is true and correct:

1. I am an attorney licensed to practice law in Hawai'i and represent the following owners of copyright protected motion pictures: Wonder One, LLC; Above Suspicion Holdings, LLC; Right Angle Productions, LLC; After Productions, LLC; After II Movie, LLC; Morgan Creek Productions, Inc.; Glacier Films 1, LLC; Make the Movie, LLC; Temple Picture Holdings, LLC; Vantis Pictures, Ltd; Voltage Holdings, LLC; BOB GA, LLC; Bedeviled LLC; Rise Up, LLC; Rodentus, Inc.; Reliance Entertainment Productions Scandi Ltd.; Blunt Force Trauma, LLC; Broker Film, LLC; Midland Entertainment; Burnt Ends, LLC/Landon Johnson; BTX Nevada, LLC; Indomina Media, Inc./IPC002 Film,

Inc.; Cabin Fever Productions, LLC; Xmas Movie, LLC; Colossal Movie Productions, LLC; Markinarium S.r.L; Dallas Buyers Club, LLC; Ace Pictures Entertainment, LLC; Dead Trigger Movie, LLC; Departures Nevada, LLC; YAR Productions, Inc.; Don Jon Nevada, LLC; Industry Releasing, Inc.; WWE Studios Finance Corp; Reliance Entertainment Productions 12 Ltd.; Escape Productions, LLC; West Arts, LLC; Backmask, LLC; Escape Room Film 2018, LLC; Fun Mom Dinner, LLC; Generation Um Holdings, LLC; Imogene Film, LLC; Cielo Tate Island, LLC; Something She, LLC; Hurt Locker, LLC; Journey Film Productions, LTD; Home Invasion Nevada, LLC; Killer Joe Nevada, LLC; Camp Grey Productions LLC; Above the Clouds, LLC; Broad Daylight LLC; Life on the Line, Inc.; Pizza Lovers Productions, Ltd.; YRF USA, LLC; Ace in the Hole Productions, LP; Ivan and Elyse Pictures, LLC; Dog Dave Productions, LLC; Maxcon Productions, Inc.; Industry Releasing, Inc.; Midnightman Holdings, LLC; Bundy Brown Island, LLC; SVZ Productions, INC.; Top Cop Productions, LLC; Venice PI, LLC; Signature Entertainment, Ltd.; Strategic Motion Ventures LLC; Personal Effects Film Corporation, LLC / PE Productions, Inc.; Splintered, LLC; Industry Releasing, Inc.; G Productions, Inc.; H Films, Inc.; Sugar Shack Productions Ontario, Inc./The Rest Of Us Inc.; Return to Sender, LLC; Prism Pictures, Inc.; Rosewood Lane Productions, Inc.; Sand Castle Film, LLC; 5G Productions, Inc. (a subsidiary of Grindstone Entertainment Group LLC); Secret

Films Limited; Enigma Pictures & Videovision Entertainment; Cinestate Seventh Day, LLC; Shock and Awe, LLC; MON, LLC; SF Film, LLC; Hybrid, LLC; The Super Productions, LLC; Handsomecharlie Films, Inc./Picture Perfect Corporation; Honeybadger, Inc.; Sojo Production, Inc.; Sojo II Productions, Inc; Cinestate VFW, LLC; State of the Union Distribution and Collections, LLC; Wind River Productions, LLC; Gearshift Distribution Inc./A Stranded Film Inc.; Asia & Europe Productions, S.A.; Laundry Films, Inc.; Dog Films, Inc.; Hillview 798 Productions, LLC dba Elle Virgo Productions; Millennium IP, Inc.; LHF Productions, Inc.; Millennium Funding, Inc.; Bodyguard Productions, Inc.; Boxer Production Services, Inc.; Rambo V Productions, Inc.; Outpost Productions, Inc.; Nikola Productions, Inc.; Hitman Two Productions, Inc.; Killing Link Distribution, LLC; FAMILY OF THE YEAR PRODUCTIONS, LLC; I am Wrath Production, Inc.; Tokarev Production, Inc.; Hannibal Classics, Inc.; Justice Everywhere Productions LLC; Badhouse Studios, LLC; Out of the Box Investment, Inc.;; Kremlin Films; Out of the Box Investment, Inc.; Speed Kills Productions, Inc.; A.I.C. Library, Inc.; Haymaker Films, LLC; AMBI Distribution Corp.; Paradox Studios, LLC; Rupture CAL, Inc.; This Beautiful Fantastic UK Limited; FW Productions, LLC; FSMQ Film, LLC; Arctic Justice Movie Limited; Paradox Studios, LLC; Nancy Cartwright; Bayou Bennett; Daniel Lir; In Search of Fellini, LLC; Picomedia srl; Screen Media Ventures, LLC; Ledge Distribution, LLC &

Foresight Unlimited, LLC; QOTD Film Investment Ltd.; Cell Film Holdings, LLC; Bootleg LLC; KYD Film LLC; CYM Film Holdings, LLC; Party Crasher Film Productions; PPB LLC; Cook Productions, LLC; BYM Productions, LLC; American Cinema Inspires, Inc.; Christmas For A Dollar LLC.; American Cinema International, Inc.; Oasis Entertainment, Inc.; Trial Film, LLC; and MeThinX Entertainment.

2. This declaration is made in support of the accompanying subpoena, pursuant to 17 USC 512(h)(2)(C).

3. The purpose of the accompanying Subpoena is to obtain the identities of the alleged copyright infringers, namely the subscribers distributing my clients' motions pictures without authorization and in many cases promoting their unauthorized distribution. The information obtained will be used only for the purpose of protecting the rights granted to the respective copyright owner.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, April 23, 2021.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper

Attorney for Owners/Requestors